

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GUGGENHEIM CAPITAL, LLC and.	:	
GUGGENHEIM PARTNERS, LLC,	:	Civil Action No.: 10 CV 8830 (PGG)
	:	
Plaintiffs,	:	
	:	
v.	:	<b>NOTICE OF MOTION</b>
	:	<b>TO WITHDRAW AS COUNSEL</b>
CATARINA PIETRA TOUMEI, A/K/A LADY	:	
CATARINA PIETRA TOUMEI A/K/A CATARINA	:	
FREDERICK; VLADIMIR ZURAVEL A/K/A	:	
VLADIMIR GUGGENHEIM A/K/A VLADIMIR Z.	:	
GUGGENHEIM A/K/A VLADIMIR Z.	:	
GUGGENHEIM BANK; DAVID BIRNBAUM	:	
A/K/A DAVID B. GUGGENHEIM; ELI PICHEL;	:	
THEODOR PARDO; DABIR, INT'L;	:	
AND JOHN DOES 1-10,	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Ben D. Manevitz dated March 11 and the Memorandum of Law, and upon all pleadings and proceedings herein, Ben D. Manevitz and the Manevitz Law Firm LLC will move this Court, at a date and time to be determined by the Court, before the Honorable Paul G. Gardephe, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an Order conforming to the Proposed Order annexed hereto.

DATED: March 14, 2011

Respectfully Submitted,

/s/Ben D. Manevitz/

Manevitz Law Firm LLC  
Ben D. Manevitz  
128 Boulevard, Suite 13  
Passaic, NJ 07055-4769  
Tel: 973/594-6529 Fax: 973/689-9529  
Email: ben@manevitzlaw.com  
Attorney for Defendants  
David Birnbaum and  
Dabir International

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GUGGENHEIM CAPITAL, LLC and.	:	
GUGGENHEIM PARTNERS, LLC,	:	Civil Action No.: 10 CV 8830 (PGG)
	:	
Plaintiffs,	:	
	:	
v.	:	(PROPOSED)
	:	
CATARINA PIETRA TOUMEI, A/K/A LADY	:	ORDER
CATARINA PIETRA TOUMEI A/K/A CATARINA	:	
FREDERICK; VLADIMIR ZURAVEL A/K/A	:	
VLADIMIR GUGGENHEIM A/K/A VLADIMIR Z.	:	
GUGGENHEIM A/K/A VLADIMIR Z.	:	
GUGGENHEIM BANK; DAVID BIRNBAUM	:	
A/K/A DAVID B. GUGGENHEIM; ELI PICHEL;	:	
THEODOR PARDO; DABIR, INT'L;	:	
AND JOHN DOES 1-10,	:	
	:	
Defendants.	:	
-----	X	

UPON the annexed Declaration of Ben D. Manevitz dated March 11, 2011, and the Memorandum of Law in support of the Motion for Attorney Withdrawal, and Good cause having been shown:

IT IS ORDERED that, pursuant to Local Civil Rule 1.4, Ben D. Manevitz and the Manevitz Law Firm LLC are permitted to withdraw from all representation in this case, on the basis of, *inter alia*, irreconcilable differences, conflicts, lack of cooperation with counsel, the consent of defendants and other good cause for withdrawal;

IT IS FURTHER ORDERED that the Memorandum of Law and the Declaration of Ben D. Manevitz annexed in support of the motion shall be filed under seal, and that only this Order, without the accompanying declaration and memorandum of law, be served upon plaintiffs and the order and accompanying declaration and memorandum of law be served upon defendants David Birnbaum and Dabir International;

IT IS FURTHER ORDERED that all proceedings in the above captioned action be stayed for thirty (30) days to allow time for defendants David Birnbaum and Dabir International to retain new counsel.

DATED: \_\_\_\_\_

\_\_\_\_\_  
P.G.G.